

JEREMY GUTMAN
ATTORNEY AT LAW
40 FULTON STREET, 23RD FLOOR
NEW YORK, NEW YORK 10038

(212) 644-5200

E-MAIL: JGUTMAN@JEREMYGUTMAN.COM

December 24, 2020

By ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. El Gammal
15 Cr. 588 (ER)

Dear Judge Ramos:

On behalf of defendant Ahmed Mohammed El Gammal, I am writing in response to the government's request for an extension of time to respond to our motion for compassionate release. For the reasons discussed in our memorandum in support of that motion, and particularly in light of the growing number of coronavirus cases at FCI Phoenix¹, we seek a determination of our motion as soon as practicable. Given the timing of our motion so close to the holidays, however, and in the hope that it will not substantially delay the adjudication of this matter, we will not object to the government's request.²

¹In previous correspondence to the Court, I mistakenly indicated that there were currently 303 positive cases among inmates at FCI Phoenix; the BOP chart I referred to provided the number of positive *tests*, some of which were apparently repeated for the same individual. As of today, the BOP website reports that there are 252 "confirmed active cases" at that facility.

²Earlier today, I provided to the government Mr. Gammal's complete medical records from 2019 and 2020, which I received from the BOP approximately one month ago. After conferring with Assistant United States Attorneys Andrew J. DeFilippis and Negar Tekeei, it is my understanding that they maintain the view that review of records from the

(continued...)

Hon. Edgardo Ramos
December 24, 2020
Page 2

Respectfully,

/s/
Jeremy Gutman
Attorney for Defendant
Ahmed Mohammed El Gammal

²(...continued)
earlier years of Mr. Gammal's incarceration is necessary for their response.